

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

Case No. 23-CR-98

SHEDRACK UMIKORO,

Defendant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

Pursuant to Fed. R. Crim. P. 45(b)(1)(A), Mr. Shedrack Umukoro, Defendant, by his counsel, Attorney Corey Mehlos of CASPER MEHLOS LAW GROUP, LLC moves the Court to enlarge the time to file any motions by forty-three days, or through May 10, 2024. This motion is unopposed by the Government.

AS GROUNDS, counsel asserts:

1. Mr. Umukoro, the Defendant, retained undersigned counsel's firm on January 31, 2024.
2. At the Arraignment, the Court set a deadline for the filing of any motions to be on or before February 12, 2024. This deadline was then extended by motion to March 28, 2024.
3. There was a delay receiving discovery from Mr. Umukoro's predecessor counsel. When discovery was received on February 14, 2024, undersigned counsel realized that the vast majority of the discovery had not yet been provided. Accordingly, since that date, undersigned counsel has been working with the Government to obtain the balance of the discovery, which is quite voluminous, including 400 PDF

documents referenced by the co-defendant's counsel, as well as a large amount of electronic discovery derived from extractions. The Government most recently remitted discovery to undersigned counsel on March 21, 2024.

4. Undersigned counsel has met with Mr. Umukoro on multiple occasions at the Kenosha County Detention Center over the past two months, but has been limited in time to review discovery due to vacation and attending several out-of-state seminars in addition to other client work. Undersigned counsel has been able to review the vast majority of the written documents yet still needs more time to finish his review of the digital evidence.
5. Counsel was in communication with AUSA Rebecca Taibleson last week, and she informed him that the Government does not oppose another request for an extension if needed.
6. To track the extension this Court granted with respect to the co-defendant, Mr. Idouzee, undersigned counsel is seeking an extension through May 10, 2024.
7. Therefore, counsel moves this Court to make a specific finding under 18 USC § 3161(h)(1)(7)(a), that the ends of justice served by the extension outweigh the best interests of the defendant and the public in a speedy trial, and that the timeframe of the extension is excluded from the speedy trial timeline.

Dated this 27th day of March, 2024.

Respectfully submitted,
CASPER MEHLOS LAW GROUP, LLC

Electronically signed by

/s/ Corey G. Mehlos

Corey G. Mehlos
Counsel for Shedrack Umukoro

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